

Before The  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C. 20554

DOCKET FILE COPY ORIGINAL

ORIGINAL

RECEIVED

APR 08 1999

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of: )  
)  
Amendment of Section 73.202(b) ) MM Docket No.  
Table of Allotments, ) RM-  
FM Broadcast Stations. )  
(Greeley and Broomfield, Colorado) )

**PETITION FOR RULE MAKING**

Chancellor Media/Shamrock Radio, Licensees L.L.C. ("*Chancellor*"), licensee of Station KVOD-FM, Channel 223C1, Greeley, Colorado (the "*Station*"), hereby petitions the Commission to change the community of license of the Station from Greeley to Broomfield, Colorado by adding Channel 223C1 at Broomfield, deleting Channel 223C1 at Greeley, and modifying the Station's license to specify Broomfield as its community of license.

The proposed change complies fully with the Commission's rules regarding changes in community of license because (a) the use of Channel 223C1 at Broomfield is mutually exclusive with the use of that channel at Greeley, (b) the use of the channel at Broomfield (where it would provide a first local aural transmission service) has a higher allotment priority than its use at Greeley,<sup>1</sup> (c) Greeley will continue to receive full-time aural service from at least four other stations licensed to Greeley<sup>2</sup> and (d) the proposed use of the channel complies with the Commission's technical rules.<sup>3</sup> See 47 C.F.R. §1.420(i). See also

No. of Copies rec'd 074  
List ABCDE MMB

<sup>1</sup> The proposed reallocation will provide a first local aural transmission service to Broomfield, an incorporated city with a 1990 census population of 24,638. Although a single noncommercial educational television channel is allotted to Broomfield, the city presently enjoys no local AM or FM transmission services.

<sup>2</sup> The stations are: KUNC-FM (full service on Channel 218C1), KGLL-FM (full service on Channel 241C1), KFKA-AM (daytime and nighttime service at 1310 kHz) and KGRE-AM (unlimited service at 1450 kHz).

<sup>3</sup> See Engineering Statement of Hatfield & Dawson (attached as Exhibit 1).

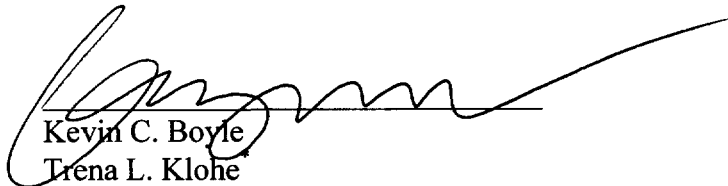
*Revision of FM Assignment Policies and Procedures*, 90 FCC 2d 88 (1982); *Amendment of the Commission's Rules Regarding Modification of FM and TV Authorizations to Specify a New Community of License*, 4 FCC Rcd 4870 (1989), *recon. granted in part*, 5 FCC Rcd 7094 (1990). Although the Station now provides city-grade service to substantial portions of both the Denver and Boulder Urbanized Areas, because the Station is already supplying service to these areas and because no change in transmitter location is necessary to provide service to Broomfield (or proposed in connection with this petition), a “*Tuck showing*” demonstrating Broomfield’s independence from its urban neighbors is not required. *E.g., Killeen and Cedar Park, Texas*, 1998 FCC LEXIS 5108 (1998); *see also Boulder and Lafayette, Colorado*, 11 FCC Rcd 3632 (1996); *East Los Angeles, Long Beach, and Frazier Park, California*, 10 FCC Rcd 2864 (1995). If the Commission allots Channel 223C1 to Broomfield, Colorado, Chancellor will apply for a construction permit to so change the community of license of the Station.

For the reasons stated above, Chancellor respectfully requests the Commission to issue a notice of proposed rulemaking and grant its petition and to amend the FM Table of Allotments as follows:

<i>Community</i>	<i>Present</i>	<i>Proposed</i>
Broomfield, Colorado	—	223C1
Greeley, Colorado	223C1	—

The public interest will be served by providing Broomfield with its first local  
aural transmission service.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Kevin C. Boyle', is written over a horizontal line.

Kevin C. Boyle  
Trena L. Klohe  
LATHAM & WATKINS  
1001 Pennsylvania Avenue, N.W.  
Suite 1300  
Washington, D.C. 20004

Counsel for Chancellor Media/  
Shamrock Radio, Licensees L.L.C.

April 8, 1999

---

\* Admitted in Maryland only.

## EXHIBIT 1

### Engineering Statement of Hatfield & Dawson

JAMES B. HATFIELD, PE  
BENJAMIN F. DAWSON III, PE  
THOMAS M. ECKELS, PE  
STEPHEN S. LOCKWOOD, PE  
PAUL W. LEONARD, PE  
CHRISTIANE ENSLOW REYES  
ERIK C. SWANSON  
DAVID J. PINION, PE  
CONSULTANT

HATFIELD & DAWSON  
CONSULTING ELECTRICAL ENGINEERS  
9500 GREENWOOD AVE. N.  
SEATTLE, WASHINGTON 98103

TELEPHONE  
(206) 783-9151  
FACSIMILE  
(206) 789-9834  
E-MAIL  
hatdaw@hatdaw.com  
MAURY L. HATFIELD, PE  
CONSULTANT  
Box 1326  
ALICE SPRINGS, NT 5950  
AUSTRALIA

## ENGINEERING STATEMENT

PETITION FOR RULEMAKING TO  
AMEND SECTION 73.202 OF THE RULES  
AND REGULATIONS FOR THE FEDERAL  
COMMUNICATIONS COMMISSION

TO ASSIGN FM CHANNEL 223C1  
FOR USE AT BROOMFIELD, COLORADO

SHAMROCK BROADCASTING, INC.

3/99

## ENGINEERING STATEMENT

This Engineering Statement has been prepared on behalf of Shamrock Broadcasting, Inc. ("Shamrock"), licensee of FM station KVOD, channel 223C1 at Greeley, Colorado, in support of a Petition for Rulemaking to amend §73.202 of the Commission's Rules. Shamrock proposes the reallocation of channel 223C1 from Greeley to Broomfield, Colorado, and the modification of station KVOD's license to specify Broomfield as its community of license.

As outlined in the attached channel study, channel 223C1 can be assigned for use at Broomfield in compliance with the Commission's applicable Rules and Regulations regarding the separation among FM allotments. For this channel study the following coordinates have been used: NL 40° 03' 15" x WL 105° 04' 12".<sup>1</sup> This site is located 15 kilometers from the City of Broomfield, the reference coordinates of which are NL 39° 55' 14" x WL 105° 05' 10". The nominal distance to the 70 dBu F(50,50) contour for a Class C1 station is 50 kilometers. Therefore, this site will provide greater than 70 dBu coverage for all of Broomfield.

---

<sup>1</sup>The licensed site of KVOD is short-spaced to the licensed operation of KJMN, channel 221C2 at Castle Rock, Colorado. That short-spacing arose as a result of a site change by KJMN. Therefore, even though KVOD operates at its present site as a "fully spaced" station, an alternate and truly fully-spaced allotment reference site has been specified for the sake of completeness.

Hatfield & Dawson Consulting Engineers

Shamrock does not propose by this Petition for Rulemaking any change of transmitter site for KVOD. KVOD can continue to operate on channel 223C1 at Broomfield with the facilities specified in its current licence, FCC File No. BLH-940426KB. The attached map exhibit demonstrates that the licensed KVOD facility provides 70 dBu service to all of Broomfield.

This proposal will provide first local service to Broomfield. Greeley will not be deprived of local service, as stations KUNC(FM) 218C1, KGLL(FM) 241C1, KFKA(AM) 1310 kHz, and KGRE(AM) 1450 kHz will remain licensed to Greeley.

Hatfield & Dawson Consulting Engineers

---

Seattle, WA

## FM SEPARATION STUDY

Job Title :Broomfield 223C1

Separation Buffer 100 km

Channel 223C1 ( 92.5 MHz)

FCC DB Date : 03/05/99

Coordinates : 40-03-15 105-04-12

Call Status	City State	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-Tru	Dist. (km)	Req. (km)
----------------	---------------	--------------	------------------	--------------------	-----------------------	--------------------	---------------	--------------

K276BJ	Boulder		276D	.074	DA	40-04-19	274.8	24.31	0
LIC	CO	BLFT830214MC	103.1	769.0		105-21-14		.00	TRANS
TRANSLATOR FOR KTCL, FT. COLLINS, CO.									

KZYR	Avon		276C2	15.0		39-38-05	248.8	126.69	27
LIC	CO	BLH980202KB	103.1	134.0		106-26-47	SS	99.69	CLEAR

KAVD	Limon		276C1	100.		39-22-17	124.6	132.66	34
CP	CO	BPH960221MB	103.1	208.0		103-48-02		98.66	CLEAR

NEW-T	Woodland Park		277D	.015		38-59-13	179.9	118.50	0
APP	CO	BPFT970912TI	103.3	423.0		105-04-08		.00	TRANS
Translator for KRCCFM, Colorado Springs, CO.									

\*\* End of separation study for channel 223C1 \*\*



North  
↑

KVOD(FM) License  
70 dBu F(50,50)

City of Broomfield

N 39 30 00  
W 105 30 00

SIGNAL (tm): D: \KVOD\BROOM.MAP

KILOMETERS  
20 0 20 40

223C1 at Broomfield

Hatfield and Dawson

Broomfield

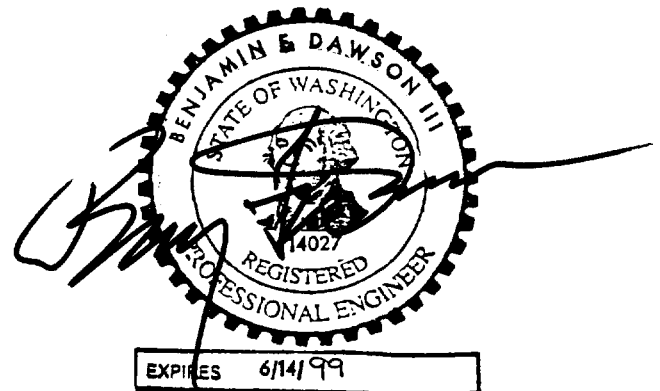
Mar 1999

Ref. grid: 30'

## CERTIFICATION

This Engineering Statement supporting a Petition for Rulemaking to revise the Table of Allotments to specify channel 223C1 for use at Broomfield, Colorado has been prepared on behalf of Shamrock Broadcasting, Inc. All representations herein are true to the best of my knowledge. I am an experienced radio engineer whose qualifications are a matter of record with the Federal Communications Commission. I am a partner in the firm of Hatfield & Dawson Consulting Engineers and am Registered as a Professional Engineer in the States of Washington and California.

March 15, 1999



Benjamin F. Dawson III, P.E.

Hatfield & Dawson Consulting Engineers

Seattle, WA

## FM SEPARATION STUDY

Job Title :Broomfield 223C1

Separation Buffer 100 km

Channel 223C1 ( 92.5 MHz)

FCC DB Date : 03/05/99  
Coordinates : 40-03-15 105-04-12

Call Status	City State	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-Tru	Dist. (km)	Req. (km)
----------------	---------------	--------------	------------------	--------------------	-----------------------	--------------------	---------------	--------------

PADD	Douglas WY	RM9320	223C1 92.5	.0	42-40-19 105-05-05	359.8	290.73 45.73	245 CLEAR
------	---------------	--------	---------------	----	-----------------------	-------	-----------------	--------------

Site restriction 27.8 km East

KCRTFM	Trinidad		223C1	15.0	36-59-33	171.1	343.82	245
LIC	CO	BLH950830KB	92.5	311.0	104-28-24		98.82	CLEAR

From Channel 224A Per D83-594-Transmitter site located in New Mexico.

K224AD	Estes Park, etc.		224D	.018	40-25-13	322.2	51.65	0
LIC	CO	BLFT77	92.7	661.0	105-26-39		.00	TRANS

TRANSLATOR FOR KVID, DENVER, CO.

K232CR	Cheyenne		224D	.193	41-08-55	4.5	121.92	0
APP	WY	BPFT970903TD	92.7	149.0	104-57-22		.00	TRANS

Translator for KCSP, Casper, WY  
From Channel 232-Vertical Polarization Only

K224CE	Canyon Valley		224D	.008	40-27-44	287.3	158.07	0
LIC	CO	BLFT941027TB	92.7	460.0	106-51-00		.00	TRANS

Translator for KVID, Denver, CO.

ALC	Centennial WY	Docket97-88	224A 92.7	.0	41-19-03 105-59-55	331.2	160.77 27.77	133 CLEAR
-----	------------------	-------------	--------------	----	-----------------------	-------	-----------------	--------------

Site Restriction 11.9km East-Effective 9-2-97 per D97-88

KKCH	Glenwood Springs		224C	56	39-25-07	251.0	209.28	209
LIC	CO	BLH971224KG	92.7	763.0	107-22-06	SS	.28	CLOSE

Amended 981007

KSPZ	Colorado Springs		225C	79.	38-44-44	172.9	146.40	105
CP	CO	BPH960605IA	92.9	670.0	104-51-42		41.40	CLEAR

KSPZ	Colorado Springs		225C	72.	38-44-44	172.9	146.41	105
LIC	CO	BLH850207LW	92.9	649.0	104-51-39		41.41	CLEAR

WAIVER OF MINIMUM POWER GRANTED FOR CLASS C

K226AH	Frisco		226D	0.15	39-38-05	248.8	126.69	0
LIC	CO	BLFT980717TD	93.1	655.0	106-26-47		.00	TRANS

Translator for KYSL, Frisco, CO-  
Vertical Polarization Only

Seattle, WA

## FM SEPARATION STUDY

Job Title :Broomfield 223C1

Separation Buffer 100 km

Channel 223C1 ( 92.5 MHz)

FCC DB Date : 03/05/99  
Coordinates : 40-03-15 105-04-12

Call Status	City State	Channel FCC File No.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-Tru	Dist. (km)	Req. (km)
K220ER LIC	Frisco CO	220D BLFT960209TD	.250 91.9	39-37-31 106-04-53	241.4	98.81	0
Translator For KTLF-FM, Colorado Springs, CO							
K220GH LIC	Lake George CO	220D BLFT980825TC	.075 91.9	39-03-01 105-30-50	199.0	117.81	0
Translator for KTLFFM, Colorado Springs, CO Vertical Polarization Only							
NEW-T APP	Brush CO	220D BPFT990204TE	.25 91.9	40-16-19 103-38-20	78.3	124.31	0
Translator for KTLFFM, Colorado Springs, CO.							
KUWR LIC	Laramie WY	220C BLED941031KW	100. 91.9	41-18-36 105-27-17	347.0	143.21	105
38.21 CLEAR							
K220GW CP	Parkdale CO	220D BPFT980520TA	.005 91.9	38-30-55 105-18-27	186.9	172.08	0
Translator for KRCC, Colorado Springs, CO							
NEW-T APP	Atwood CO	220D BPFT990204TD	.1 91.9	40-37-44 103-09-58	67.8	173.91	0
Translator for KTLFFM, Colorado, CO.							
KJMN LIC	Castle Rock CO	221C2 BLH950929KE	33. 92.1	39-25-15 104-39-15	153.1	78.85	79
SS -.15 SHORT							
K222AJ LIC	Vail CO	222D BLFT980626TF	.099 92.3	39-36-58 106-26-57	248.0	127.69	0
Translator for KZGOFM, Glenwood Springs, CO							
KVRHFM LIC	Salida CO	222C3 BLH940517KA	13.5 92.3	38-30-26 106-01-22	205.8	190.41	144
46.41 CLEAR							
KKYT CP	Holyoke CO	222C1 BPH970224MF	100. 92.3	40-51-42 102-23-35	67.5	244.13	177
67.13 CLEAR From Channel 222C2 per one-step application							
KVOD LIC	Greeley CO	223C1 BLH940426KB	57.0 92.5	40-05-47 104-54-04	71.9	15.16	245
-229.84 SHORT							

Hatfield &amp; Dawson Consulting Engineers